

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY,
MICHAEL CONNELLY, SYLVIA DAY, JONATHAN
FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND,
CHRISTINA BAKER KLINE, MAYA SHANBHAG
LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN,
JODI PICOULT, DOUGLAS PRESTON, ROXANA
ROBINSON, GEORGE SAUNDERS, SCOTT TUROW,
and RACHEL VAIL, individually and on behalf of others
similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP
LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC,
OAI CORPORATION LLC, OPENAI HOLDINGS LLC,
OPENAI STARTUP FUND I LP, OPENAI STARTUP
FUND GP I LLC, and OPENAI STARTUP FUND
MANAGEMENT LLC,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH,
RICH COHEN, EUGENE LINDEN, DANIEL OKRENT,
JULIAN SANCTON, HAMPTON SIDES, STACY
SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and
SIMON WINCHESTER, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI OPCO LLC, OPENAI GP, LLC,
OPENAI, LLC, OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, OPENAI HOLDINGS, LLC,
OPENAI STARTUP FUND I LP, OPENAI STARTUP
FUND GP I LLC, and MICROSOFT CORPORATION,

Defendants.

ECF CASE

No. 23-cv-08292-SHS

No. 23-cv-10211-SHS

No. 24-cv-00084-SHS

**RULE 7.1 CORPORATE
DISCLOSURE
STATEMENT**

NICHOLAS A. BASBANES and NICHOLAS
NGAGOYEANES (professionally known as Nicholas
Gage), individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC., OPENAI
GP, LLC, OPENAI HOLDINGS, LLC, OAI
CORPORATION, LLC, OPENAI GLOBAL, LLC,
OPENAI, LLC, and OPENAI OPCO LLC,

Defendants.

Defendants OpenAI, Inc., OpenAI OpCo, L.L.C., OpenAI GP, L.L.C., OpenAI, L.L.C., ,
OpenAI Global, L.L.C., OAI Corporation, L.L.C., OpenAI Holdings, L.L.C., OpenAI Startup
Fund I, L.P., OpenAI Startup Fund GP I, L.L.C., and OpenAI Startup Fund Management, L.L.C.
(together, “OpenAI”), by and through their undersigned counsel, pursuant to Federal Rule of
Civil Procedure 7.1, disclose as follows:

1. OpenAI, Inc. states that it has no parent corporation and that no publicly held
corporation has a financial interest of 10% or more.

2. OpenAI GP, L.L.C. states that it is a subsidiary of OpenAI, Inc. and that no
publicly held corporation has a financial interest of 10% or more.

3. OpenAI, L.L.C. states that it is a subsidiary of OpenAI Global, L.L.C. and that
Microsoft Corporation is a publicly held corporation that has a financial interest of 10% or more
in OpenAI Global, L.L.C.

4. OpenAI OpCo, L.L.C. states that it is a subsidiary of OpenAI Global, L.L.C. and that Microsoft Corporation is a publicly held corporation that has a financial interest of 10% or more in OpenAI Global, L.L.C.

5. OpenAI Global, L.L.C. states that it is a subsidiary of OpenAI, Inc. and that Microsoft Corporation is a publicly held corporation that has a financial interest of 10% or more in OpenAI Global, L.L.C.

6. OAI Corporation, L.L.C. states that it is a subsidiary of OpenAI, Inc. and that no publicly held corporation has a financial interest of 10% or more.

7. OpenAI Holdings, L.L.C. states that it is a subsidiary of OpenAI, Inc. and that no publicly held corporation has a financial interest of 10% or more.

8. OpenAI Startup Fund I, L.P. states that it is a subsidiary of OpenAI Startup Fund GP I, L.L.C. and that Microsoft Corporation is a publicly held corporation that has a financial interest of 10% or more in OpenAI Startup Fund I, L.P.

9. OpenAI Startup Fund GP I, L.L.C. states that it has no parent corporation and that no publicly held corporation has a financial interest of 10% or more.

10. OpenAI Startup Fund Management, L.L.C. states that it has no parent corporation and that no publicly held corporation has a financial interest of 10% or more.

Dated: February 16, 2024
New York, New York

Respectfully submitted,

LATHAM & WATKINS LLP

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